

IRWIN, CAMPBELL & TANNENWALD, P.C.

ATTORNEYS AT LAW  
1730 RHODE ISLAND AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036-3101  
(202) 728-0400  
FAX (202) 728-0354  
<http://www.ictpc.com>

RICHARD F. SWIFT  
DIRECT LINE: (202) 777-3989  
[rswift@ictpc.com](mailto:rswift@ictpc.com)

July 7, 2006

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Television Station WVOZ-DT  
Facility ID 29000  
Ponce, Puerto Rico  
Request for Waiver  
MB Docket No. 03-15

Dear: Ms. Dortch:

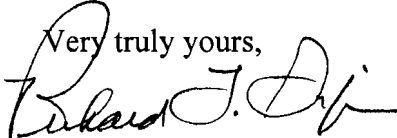
On behalf of International Broadcasting Corporation (IBC), licensee of television station WVOZ-DT, Ponce, Puerto Rico, waiver of the July 1, 2006 interference deadline is respectfully requested with respect to the digital operation of WVOZ-DT. Station WVOZ-DT has been providing digital television service to Ponce since February, 2003 pursuant to special temporary authority granted February 13, 2003. On July 7, 2006 IBC filed an application to modify its digital construction permit. Approval of this modification application will permit WVOZ-DT to commence broadcasting in accordance with Commission digital requirements as soon as it receives the appropriate equipment to accomplish such operation.

Enclosed with this letter are copies of April 23, 2006 order sheets from Thales Broadcast & Multimedia, Inc. listing the equipment ordered by IBC to complete construction of the digital facility proposed in its modification application. As soon as this equipment is received, taking into account the delay in shipping and assuming grant of the appropriate authorization, IBC will commence construction. The cost of this new equipment, \$192,793, is in addition to the cost of WVOZ-DT's prior digital costs, aggregating \$201,114, not including legal fees. It should be noted that WVOZ-TV-DT operates as a satellite station for commonly owned WTCV-DT, San Juan, Puerto Rico, which has a pending application for license for its digital television facility. BLCDT-20040722ADD. See Canal 48, Inc., 8 FCC Rcd 2193 (1993).

The foregoing demonstrates that IBC is committed to digital television operation. IBC has expended substantial monies as an independent television licensee to accomplish digital

Marlene H. Dortch  
July 7, 2006  
Page two

operation on its television stations in Puerto Rico, including WTCV-DT, WVOZ-DT and its other satellite facility, WVEO-DT, Aguadilla. In consequence, there is good cause for grant of this wavier request.

Very truly yours,  
  
Richard F. Swift

cc w/encl: Shaun Maher, Federal Communications Commission, Room 2-A820

# THALES

BROADCAST & MULTIMEDIA

**THALES BROADCAST & MULTIMEDIA Inc.**

June 23rd, 2006

104 Feeding Hills Road  
Southwick, MA 01077-9350 - USA  
Tel. : (413) 998-1100  
Fax : (413) 569-0679

Mr. Pedro Roman Collazo, President  
International Broadcasting Corporation  
1554 Bori Street  
San Juan, Puerto Rico 00927-6113

Via: Federal Express

RE: Thales Contract #6485TDU1K8AV-061306 WVOZ-DTV 47 Ponce, Puerto Rico

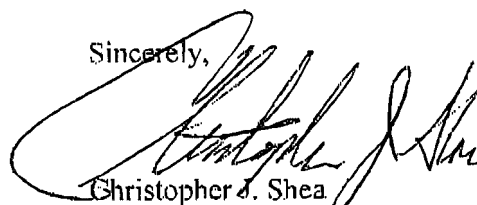
Dear Mr. Collazo,

This letter is response to your request for specific information regarding delivery on the above order for the THALES Type TDU2 1K80 ATSC 1.5kW Air Cooled, Solid State, 8-VSB Digital Equipped UHF-TV Transmitter that was placed by International Broadcasting Company.

With respect to your request for delivery in June, given the resources available to us and the long lead-time on frequency sensitive components, a June delivery is not possible. We are currently anticipating a ship date from the factory in October-November 2006 time period although if we are able to ship sooner, we will do our best to do so.

If you have any questions, please contact either Mr. Fernando Monetti or me (413-998-1104 [christopher.shea@us.thales-bm.com](mailto:christopher.shea@us.thales-bm.com)) at your earliest convenience.

Sincerely,



Christopher J. Shea  
Director of Contract Operations

CJS/cjs

cc:

Mr. Fernando Monetti,

**THALES**

BROADCAST & MULTIMEDIA  
104 Feeding Hills Road  
Southwick, MA 01077  
Tel (413) 988-1100  
Fax (413) 988-1178

**Pricing Proposal**

**WVOZ DTV CH 47  
PONCE, PUERTO RICO  
THALES PROPOSAL #6485TDU1K8AV-061306**

"This proposal is accepted by INTERNATIONAL (insert complete legal customer name) this  
23 day of April, 2006. BROADCASTING CORP.

CUSTOMER'S COMPANY NAME: INTERNATIONAL BROADCASTING CORP.

By: 

PEDRO ROMAN COLLAZO

Title: President

Please Note: Any PO provided must state:

This order is issued pursuant to THALES Proposal number #6485TDU1K5AV-061306 and be governed by the terms contained within.

Thales shall use all reasonable efforts to Deliver 120-150 days ARO the equipment "FOB Seller's Factory or Origin" (UCC) quoted herein within Thales' Terms & Conditions Attached.

Payment Terms: Standard as quoted herein within Thales' Terms & Conditions Attached.

April-23, 2006

Note: Sellers price does not include any taxes whatsoever as detailed in Thales' Terms and Conditions of Quotation or Sale. Any applicable sales taxes to be paid by buyer to appropriate authorities.

Prices quoted herein shall be valid for a period not to exceed sixty (60) days from date of receipt, unless either accepted by Buyer or extended in writing by Seller. Thales reserves the right to change list price herein at its discretion.

# THALES

BROADCAST & MULTIMEDIA  
104 Feeding Hills Road  
Southwick, MA 01077  
Tel (413) 998-1100  
Fax (413) 998-1178

## Pricing Proposal

WVOZ DTV CH 47  
PONCE, PUERTO RICO  
THALES PROPOSAL #6485TDU1K8AV-061306

"This Proposal and all sales hereunder shall be subject to the attached Sales Terms and Conditions. Although the customer may include or reference its standard forms for orders or other notices hereunder, such standard forms will be superseded by the terms and conditions of this proposal including the attached Sales Terms and Conditions and any term or condition in such standard forms that is inconsistent with or in addition to the terms and conditions of this Proposal shall have no force or effect."

This quotation contains proprietary information and it may not be divulged to any third party without the expressed written consent of Thales Broadcast & Multimedia Inc.

The estimated ship date from the supplier is based on present stock and production levels and is subject to prior sale.

If this proposal is acceptable, please sign below and fax a copy to Thales Broadcast & Multimedia (413) 998-1178.

<b>1. Please provide exact ship-to (not billing) address:</b>	<b>2. Please provide exact billing address:</b>
INTERNATIONAL BROADCASTING CORP.	INTERNATIONAL BROADCASTING CORP.
Street 1554 Bori St.	Street 1554 Bori St.
City San Juan	City San Juan
County	County
State Puerto Rico	State Puerto Rico
Zip Code 00927-6113	Zip Code 00927-6113

3. a) Are you tax-exempt? ☐ No ☒ Yes

b) If yes, please attach copy of your tax exemption certificate.

TAX EXEMPTION, DUE TO COMMUNICATION EQUIPMENT.

April-23, 2006

Note: Sellers price does not include any taxes whatsoever as detailed in Thales' Terms and Conditions of Quotation or Sale. Any applicable sales taxes to be paid by buyer to appropriate authorities.

Prices quoted herein shall be valid for a period not to exceed sixty (60) days from date of receipt, unless either accepted by Buyer or extended in writing by Seller. Thales reserves the right to change list price herein at its discretion.

**THALES**

BROADCAST & MULTIMEDIA  
104 Feeding Hills Road  
Southwick, MA 01077  
Tel (413) 998-1100  
Fax (413) 998-1178

**Pricing Proposal**

**WVOZ DTV CH 47  
PONCE, PUERTO RICO  
THALES PROPOSAL #6485TDU1K8AV-061306**

QTY	ITEM #	DESCRIPTION	NET PRICE
		<b><u>SCHEDULE A/ "ULTIMATE SERIES" Digital Television Transmitter:</u></b>	
1	1	THALES Type TDU2 1K80 ATSC 1.5kW Air Cooled Solid State, 8-VSB Digital Equipped UHF-TV Transmitter	\$145,00
1	S-2	Transmitter Commissioning, Checkout, and Proof-of-Performance	\$12,659
		<b><u>SCHEDULE C/System Options:</u></b>	
1	S-4	Line Voltage Protection System DELTA 208V	\$2,700
1	S-16	Shipping (estimate)	\$8,889
1	S-17	Offloading and Placement (estimate)	\$2,222
1	S-35	Agilent (Hewlett Packard) Power Meter	\$5,127
		<b><u>PSIP Generator Equipment:</u></b>	
1	1	PEARL TNM-5721 Generator System	\$10,136
1	2	4 hours Phone Support	Included
		<b><u>Optional Items:</u></b>	
1	3	Shipping (estimate)	\$133.00
1	4	Option 1 - Gold Service	\$910
1	5/6	Option 2 - Pearl Option and Add on to Thales P-2 Gold Service	\$5,017
		<b>Total</b>	<b>\$ 192,793</b>

April-23, 2006

Note: Sellers price does not include any taxes whatsoever as detailed in Thales' Terms and Conditions of Quotation or Sale. Any applicable sales taxes to be paid by buyer to appropriate authorities.

Prices quoted herein shall be valid for a period not to exceed sixty (60) days from date of receipt, unless either accepted by Buyer or extended in writing by Seller. Thales reserves the right to change list price herein at its discretion.

### Declaration

Pedro Roman Collazo hereby declares under penalty of perjury as follows:

I am the President of International Broadcasting Corporation, the licensee of television station WVOZ-DT, Ponce, Puerto Rico.

I have read the attached letter to the Commission requesting waiver of the July 1, 2006 replication/maximization interference protection deadline in MB Docket No. 03-15 as it pertains to the operation of WVOZ-DT and I confirm that the facts relating to the digital broadcast operation of WVOZ-DT are true and correct.

  
Pedro Roman Collazo

Date: July 7, 2006